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*Attorneys for Defendant Meta Platforms, Inc.
(f/k/a Facebook, Inc.)*

Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

META PLATFORMS, INC. (f/k/a Facebook,
Inc.), a Delaware corporation,

Defendant.

Case No. 4:22-cv-00051-YGR

**STIPULATION AND ~~PROPOSED~~
ORDER RE: MOTION TO DISMISS
BRIEFING**

Pursuant to Civil Local Rule 7-12, the parties respectfully submit this stipulation and
proposed order regarding briefing on Defendant's pending motion to dismiss.

WHEREAS, Defendant Meta Platforms, Inc. filed a motion to dismiss on March 7,
2022 (Dkt. 22);

1 WHEREAS, pursuant to the briefing schedule adopted by the Court, Plaintiff Jane
 2 Doe's opposition to Defendant's motion is due on April 21, 2022, and Defendant's reply in
 3 support of its motion is due on June 6, 2022 (Dkt. 20);

4 WHEREAS, after reviewing Defendant's motion, Plaintiff's counsel determined that
 5 the default page limit of 25 pages would not enable Plaintiff to adequately address and respond
 6 to numerous complex issues raised by Defendant's motion, including but not limited to a
 7 choice-of-law analysis between Burma law and California law, the availability of an immunity
 8 defense under Section 230 of the Communications Decency Act of 1996, the applicable
 9 causation standard for Plaintiff's products liability and negligence causes of action, the
 10 application of the discovery rule and the statute of limitations, whether Defendant owed a duty
 11 of care to Plaintiff and members of the proposed Class, and whether Facebook's social media
 12 application constitutes a "product" under product liability law;

13 WHEREAS, Plaintiff's counsel has met and conferred with Defendant's counsel to
 14 request an additional ten pages for her opposition brief, for a total of 35 pages, and agreed to
 15 provide Defendant an additional ten pages for its reply brief, for a total of 25 pages;

16 WHEREAS, Defendant does not oppose Plaintiff's request;

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** that,
 18 subject to the Court's approval, Plaintiff's opposition brief may include up to 35 pages, and
 19 Defendant's reply brief may include up to 25 pages.

20
 21
 22 Dated: April 19, 2022

Respectfully submitted,

23 By: /s/ Yaman Salahi

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*Attorneys for Defendant Meta Platforms, Inc.
(f/k/a Facebook, Inc.)*

ATTESTATION OF ELECTRONIC SIGNATURE

I hereby attest that pursuant to N.D. Cal. L.R. 5-1(i)(3), I have obtained the authorization from the above signatories representing Defendant to file the above-referenced document, and that the above signatories concur in the filing's content.


/s/ Yaman Salahi

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

1. Plaintiff's opposition to Defendant's motion to dismiss may include up to 35 pages; and,
2. Defendant's reply to Plaintiff's opposition may include up to 25 pages.

ENTERED: April 20, 2022


Honorable ~~Yvette~~ **Yvonne** Gonzalez Rogers
United States District Court